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June 21, 2019

**VIA ECF**

Hon. Cathy Seibel, U.S.D.J.  
The Hon. Charles L. Brieant, Jr.  
Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

**Re: REQUEST TO EXTEND DISCOVERY CUT-OFF DATES**  
**Shea v. Village of Pomona, et al., Civ. No. 7:18-cv-11170-CS**

Dear Judge Seibel:

My firm represents the Defendants in the above-cited action. This letter confirms the parties' joint request extend the following discovery cut-off dates set forth in Civil Case Plan and Discovery Schedule, entered on February 27, 2019 as per the following proposed extensions:

1. Fact Discovery Cut-off date of 6/28/2019: Extend to 08/09/2019.
2. Expert Discovery Cut-off Date of 8/27/2019: Extend to 09/09/2019.
3. Status Conference on 09/17/2019: No Change Requested.

This Request is based on the unanticipated delay in the holding of the Court-ordered mediation session, and the remaining time it will take to complete the parties' production of requested electronic discovery. This is the parties' first request for an extension of the Scheduling Order. Thank you for Your Honor's consideration of this request. I hereby confirm that a copy of this letter has been served upon Plaintiff's counsel through both facsimile and via email.

Very truly yours,

Bleakley Platt & Schmidt, LLP

  
Joseph DeGiuseppe, Jr.

cc: Michael H. Sussman, Esq.